

Revised Draft Parcel B-1 FOST, dated May 8, 2017

USEPA Comments, dated May 26, 2017

EPA has no further comments on the Navy responses to the previous EPA comments sent in March 2015. However, after EPA's March 2015 Comments on this document, new information has arisen that lead to two additional General Comments below.

General Comments

3. Section 3.1.4. Radiological Concerns. Several agencies are currently engaged in ongoing investigations regarding the nature and extent of Tetra Tech's misrepresentation of data delivered to the Navy. EPA final review and approval of the FOST will await results of these investigations and/or any other Navy action necessary to clarify the actual potential public exposure to radioactive material at and near Parcel B-1.

4. Section 6.0, Restrictions, CERCLA Institutional Controls 2d. Construction of enclosed structures. The text currently cites DTSC 2011 vapor intrusion guidance and "and any future revisions." After the date of the previous EPA comments, EPA issued its *Technical Guide for Assessing and Mitigating the Vapor Intrusion Pathway from Subsurface Vapor Sources to Indoor Air*, June, 2015. (<https://www.epa.gov/vaporintrusion/technical-guide-assessing-and-mitigating-vapor-intrusion-pathway-subsurface-vapor>.) Due to the above radiological concerns, the final FOST will be delayed for an unknown period of time. Given the evolution of the vapor intrusion regulatory environment, EPA recommends that at the time of the resolution of the above radiological concerns, the Navy should update the final FOST language to reference the most updated relevant documents from EPA (such as the above EPA June 2015 Guidance) and other regulatory agencies as well as "any future revisions" of these.